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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEB 17 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Redevelopment of Spectrum to)	ET Docket No. 92-9
Encourage Innovation in the)	
Use of New Telecommunications)	RM-7981
Technologies)	RM-8004

STATEMENT IN SUPPORT

In the above-captioned Further Notice of Proposed Rule Making,
7 FCC Rcd 6100 (1992) ("FNPRM"), the Commission proposed
rechannelizing the 3.7 - 4.2 GHz band ("4 GHz band") to accommodate
2 GHz fixed microwave users displaced to clear spectrum for
emerging technologies. Alcatel Network Systems, Inc. ("ANS"), in
its Reply Comments on the FNPRM, proposed modifying the 4 GHz
rechannelization plan to permit increased use of this band by low
and medium capacity former 2 GHz fixed microwave users without
adversely affecting C-band satellite operations.

On February 8, 1993, various members of the satellite industry
(the "Satellite Interests") jointly filed a Request for Leave to
File Additional Comments ("Request") regarding ANS' proposed 4 GHz
channel plan modification. The Satellite Interests are concerned
that rechannelization of the 4 GHz band would cause harmful
interference to C-band satellite operations.

In the Request, the Satellite Interests seek until March 10,
1993, to study and respond to ANS' 4 GHz rechannelization proposal.
Pursuant to Section 1.415 of the Commission's Rules, ANS, by its
attorneys, hereby supports grant of the Request. However, to

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ensure that this extra time is well spent, ANS would like the opportunity to meet with technical representatives of the Satellite Interests prior to the filing deadline established in response to the Request.

With an anticipated shortage of available spectrum for displaced 2 GHz users, access to the 4 GHz band for low and medium capacity systems must be pursued. Every effort must be made to evaluate the merits of the Satellite Interests' claims that rechannelizing the 4 GHz band would cause harmful interference to satellite operators and to evaluate the efficacy of ANS' modified plan in addressing these claims. Until this evaluation can be completed, any decision on reallocating the 4 GHz band is premature. In this regard, ANS, in its Reply Comments on the FNPRM, recommended that the Commission defer taking any action on the 4 GHz issue pending completion of such an evaluation. Grant of the Request would be consistent with such deferral.

ANS' proposed modification of the 4 GHz channel plan set forth in the FNPRM was not finalized until mid-January 1993. Recognizing that sufficient time might not be available to evaluate this modification prior to the January 27, 1993, FNPRM reply comment deadline, ANS, on January 19, 1993, telecopied a description of its proposal to the Satellite Interests.


During the week of February 1, 1993, counsel for ANS conferred with representatives of the Satellite Interests in person or by telephone regarding the need for the satellite industry and the fixed microwave industry to work together in an attempt to address

all aspects of the potential for interference into C-band satellite operations. ANS welcomes the commitment by the Satellite Interests, as detailed in the Request, to study the modified 4 GHz channel plan.

ANS hopes that this evaluation by the Satellite Interests will be the first step in developing an industry consensus on whether the 4 GHz band can be channelized to accommodate the needs of displaced 2 GHz users and incumbent 4 GHz band licensees. Once this consensus is reached, the Commission will be able to make a prudent and appropriate decision regarding reallocation of the 4 GHz band. Accordingly, ANS supports adoption of the Request.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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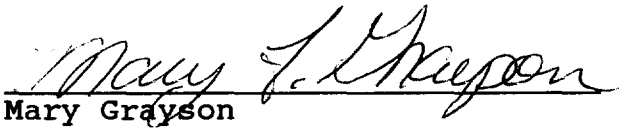
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